

1 **DICKINSON WRIGHT PLLC**
2 MICHAEL N. FEDER (NV Bar No. 7332)
3 Email: mfeder@dickinson-wright.com
4 GABRIEL A. BLUMBERG (NV Bar No. 12332)
5 Email: gblumberg@dickinson-wright.com
6 3883 Howard Hughes Parkway, Suite 800
7 Las Vegas, NV 89169
8 Telephone: (702) 550-4400
9 Facsimile: (844) 670-6009

10 **GIBSON, DUNN & CRUTCHER LLP**
11 ELIZABETH K. McCLOSKEY (CA Bar No.
12 268184) (*pro hac vice* forthcoming)
13 Email: emccloskey@gibsondunn.com
14 555 Mission Street, Suite 3000
15 San Francisco, CA 94105-0921
16 Telephone: (415) 393-4622
17 Facsimile: (415) 393-8306

18 *Attorneys for Defendant Meta Platforms, Inc.*

19 **IN THE UNITED STATES DISTRICT COURT**
20 **FOR THE DISTRICT OF NEVADA**

21 MATTHEW DAVIS, individually and on
22 behalf of all others similarly situated,

23 Plaintiff,

24 v.

25 META PLATFORMS, INC.

26 Defendant.

27 Case No. 2:23-cv-01352-APG-BNW

28 **STIPULATION TO EXTEND TIME FOR
DEFENDANT META PLATFORMS, INC.
TO RESPOND TO THE COMPLAINT
AND TO SET MOTION TO DISMISS
BRIEFING SCHEDULE
(SECOND REQUEST)**

29 Pursuant to Local Rules IA 6-1, 6-2, and Local Rule 7-1, and the Chamber Practices of the
30 Honorable Andrew P. Gordon, Plaintiff Matthew Davis (“Plaintiff”) and Defendant Meta Platforms,
31 Inc. (“Meta”), by and through their respective counsel of record, hereby stipulate as follows:

32 WHEREAS, this action was filed on August 30, 2023;

33 WHEREAS, this is the second stipulation for an extension of time for Meta to respond to the
34 Complaint;

1 WHEREAS, Meta's deadline to respond to the Complaint is currently set for October 27,
2 2023;

3 WHEREAS, Meta intends to file a motion to dismiss Plaintiff's Complaint;

4 WHEREAS, Plaintiff and Meta met and conferred regarding the deadline for Meta to respond
5 to the Complaint and agreed to extend this deadline by fourteen (14) days to November 10, 2023, to
6 set a deadline of December 1, 2023 for Plaintiff's opposition to Meta's motion to dismiss, and to set a
7 deadline of December 15, 2023 for Meta's reply in support of its motion to dismiss;

8 WHEREAS, the proposed stipulated extension will not alter the date of any other event or
9 deadline already fixed by the Court; and,

10 WHEREAS, this stipulation is without prejudice to any defense Meta might assert in this
11 action:

12 NOW, THEREFORE, Plaintiff and Meta hereby stipulate and agree to the following
13 schedule:

- 14 1. Meta's deadline to respond to the Complaint shall be extended by fourteen (14) days
15 to November 10, 2023;
- 16 2. Plaintiff's deadline to file an opposition to Meta's motion to dismiss shall be
17 December 1, 2023;
- 18 3. Meta's deadline to file a reply in support of its motion to dismiss shall be December
19 15, 2023.

20
21 IT IS SO STIPULATED.

22
23 Dated: October 26, 2023

24 **DICKINSON WRIGHT PLLC**

25 */s/ Michael N. Feder*

26 MICHAEL N. FEDER (NV Bar No. 7332)

27 Email: mfeder@dickinson-wright.com

28 GABRIEL A. BLUMBERG (NV Bar No. 12332)

 Email: gblumberg@dickinson-wright.com

 3883 Howard Hughes Parkway, Suite 800

 Las Vegas, NV 89169

24 **KEMP JONES, LLP**

25 */s/ Don Springmeyer*

26 DON SPRINGMEYER (NV Bar No. 1021)

27 Email: d.springmeyer@kempjoines.com

28 3800 Howard Hughes Parkway, 17th Floor

 Las Vegas, Nevada 89169

 Telephone: (702) 385-6000

1 Telephone: (702) 550-4400

2 **GIBSON, DUNN & CRUTCHER LLP**

3 /s/ Elizabeth K. McCloskey

4 ELIZABETH K. McCLOSKEY (CA Bar No.
268184) (*pro hac vice* forthcoming)
Email: emccloskey@gibsondunn.com
555 Mission Street, Suite 3000
5 San Francisco, CA 94105-0921
Telephone: (415) 393-4622

6 *Attorneys for Defendant Meta Platforms, Inc.*

7 **BURSOR & FISHER, P.A.**

8 NEAL J. DECKANT (CA Bar No. 322946)
(*admitted pro hac vice*)
Email: ndeckant@bursor.com
9 STEFAN BOGDANVICH (CA Bar No. 323525)
(*admitted pro hac vice*)
Email: sbogdanovich@bursor.com
1990 N. California Blvd., Suite 940
Walnut Creek, CA 94596
Telephone: (925) 300-4455

10 *Attorneys for Plaintiff*

11 **IT IS SO ORDERED:**

12

UNITED STATES MAGISTRATE JUDGE

13 DATED: _____

14 CASE NO.: 2:23-CV-01352-APG-BNW